IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

RECEIVED

SONIA R. HAMMOCK,	2007 OCT -5 A 9: 51
Plaintiff,	DEBRA P. HACKETT, CL. U.S. DISTRICT COURT MIDDLE DISTRICT ALA
v.) Civil Action Number:
NELL E. LAMB and TODD SWING, et al.,	2:07cV896-wha
Defendants.))

ANSWER OF DEFENDANT, TODD SWING ("SWING")

First Defense

Swing denies each and every material allegation of the complaint. He demands strict proof thereof.

Second Defense

Swing specifically denies that he was guilty of any wantonness as alleged in the complaint. He denies that he was guilty of the type conduct required for the imposition of punitive damages under Alabama law. He demand clear and convincing evidence of such wrongful conduct.

Third Defense

Swing denies that Nell E. Lamb was an incompetent driver or that he negligently entrusted his automobile to her. He demands strict proof thereof.

Fourth Defense

Swing denies that the plaintiff is entitled to recover the items and amounts of damages alleged in the complaint. He demands strict proof thereof.

Fifth Defense

Swing reserves the right to amend his answer to raise additional or different defenses in accordance with the court's scheduling order.

Laur Bellyon

R. Larry Bradford, Attorney for Defendant,

Todd Swing

Attorney Bar Code: ASB-8038-F64R

OF COUNSEL:

Bradford & Sears, P.C. 2020 Canyon Road Suite 100 Birmingham, AL 35216

CERTIFICATE OF SERVICE

I hereby certify that I have this the day of September, 2007 served a copy of the foregoing to all attorneys of record by electronically filing and/or placing a copy of same in the United States Mail, postage prepaid and properly addressed as follows:

Tedford Taylor, Esq. Taylor & Taylor 2130 Highland Avenue Birmingham, AL 35205

OF COUNSEL

Paul Bellyped